

1 MELINDA HAAG (CABN 132612)
2 United States Attorney

3 MIRANDA KANE (CABN 150630)
Chief, Criminal Division

4 KIRSTIN M. AULT (CABN 206052)
Assistant United States Attorney

5 450 Golden Gate Ave., Box 36055
6 San Francisco, California 94102
7 Telephone: (415) 436-6940
Facsimile: (415) 436-7234
E-mail: kirstin.autl@usdoj.gov

9 Attorneys for United States of America

10

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,) No.
15 Plaintiff,) UNITED STATES' MOTION TO SEAL
16 v.) EXHIBIT AND ~~PROPOSED~~ ORDER
17 DANIEL JOHNSON,)
18 Defendant.)

20 The United States hereby moves the Court for an order sealing Exhibit 1 to the
21 United States' Opposition to the Defendant Johnson's Motion for Release, until further
22 order of the Court. The exhibit is a copy of a police report which contains details
23 regarding the alleged criminal conduct of individuals not charged in this matter as well as
24 the names of witnesses to the violent assault with which the defendant is charged in the
25 state matter in Illinois. The United States believes that disclosure of this exhibit will
26 reveal potentially disparaging information regarding persons who were involved in the
27 state matter but who are not before this Court. Moreover, disclosure of the exhibit will
28 reveal the names and statements of witnesses to the assault in Illinois, who may be subject

1 to unwanted public attention or pressure as a result of their involvement in assisting the
2 officers during the assault. The United States will serve a copy of the exhibit on counsel
3 for the defendant but requests that it be sealed in the public docket.

5 | DATED: November 7, 2011

Respectfully submitted,

MELINDA HAAG
United States Attorney

/s/
KIRSTIN M. AULT
Assistant United States Attorney

ORDER

12 Based upon the motion of the government and for good cause shown, IT IS
13 HEREBY ORDERED that Exhibit 1 to the United States' Opposition to Defendant
14 Johnson's Motion for Release shall be sealed until further order of the Court, except that
15 a copy of the exhibit may be served on counsel for the defense.

DATED: 8/14/01

BERNARD ZIMMERMAN
United States Magistrate Judge

28